

Remarks**I. Administrative Overview**

Claims 1-20, 23-53 and 56-76 were previously presented. Claims 1, 2, 4, 11, 24, 28-31, and 68 are hereby amended, and Claims 23, 25-27, 29-67, and 69-76 are cancelled. Applicant hereby adds new claim 77. Upon entry of the present amendments, Claims 1-20, 24, 28, 68 and 77 are pending and presented for reexamination. No new matter has been introduced by the claim or the newly-added claims.

Applicants respectfully request reconsideration and withdrawal of all rejections asserted against the pending claims.

II. Specification Objections

The Examiner objected that the Specification failed to provide support for Claims 34-53, 56, 57-65 and 66. Although Applicants respectfully disagree with the Examiner's objection, Applicant hereby cancels claims 34-53, 56, 57-65 and 66. Therefore, Applicants respectfully request that the Examiner withdraw the objections to the Specification.

III. Rejections under 35 U.S.C. § 112

Claims 34-43, 44-53, 56, 57-65 and 66 were rejected under 35 U.S.C. § 112, first paragraph for failing to comply with the written description requirement. Applicants respectfully disagree with the Examiner's contention that the phrase "computer readable medium" is not supported by the present disclosure. However, Applicants hereby cancel claims 34-53, 56, 57-65 and 66, mooted this rejection with respect to those claims.

IV. Rejections under 35 U.S.C. § 101

Claims 34-43 were rejected under 35 U.S.C. § 101 for failing to claim statutory subject matter. Applicants respectfully submit that Claims 34-43, as previously presented, claim statutory subject matter. Nevertheless, Applicants hereby cancel claims 34-43, mooting this rejection with respect to those claims.

V. Rejections under 35 U.S.C. § 103(a)

Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 were rejected under 35 U.S.C. § 103 as unpatentable over European Patent Application No. EP1187022 to Arteaga et al. (“Arteaga”) in view of U.S. Publication No. 2005/0091302 to Soin et al. (“Soin”). Applicants respectfully submit that Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 as previously presented are patentable over Arteaga in view of Soin. Nevertheless, Applicant hereby claims 23, 34, 36, 43-45, 58 and 56, mooting this rejection with respect to those claims. Independent claims 1 and 11 have been amended to more clearly recite the claimed invention. Applicants respectfully traverse this rejection to the extent it is maintained over the claims as amended.

A claimed invention is obvious when a reference, either alone or in combination with another reference, teaches or suggests each and every element of the claimed invention. Applicants respectfully submit that any combination of Arteaga and Soin fails to teach or suggest each and every element of the claimed invention.

Arteaga fails to track an event notification regarding a device in communication with the client or proxy client as is required by each independent claim. Arteaga describes a system where the client device is any client such as a Palm or hand-held telephone and where an application on the client device intercepts events and sends them to a server. In Arteaga, the device is the client, therefore the device is not a device that is separate from the client. Thus Arteaga does not describe a device that is in communication with the client or proxy client, because the device and the client described in Arteaga are the same thing. *See* Arteaga, paragraph 28, and 42-44. Arteaga, therefore, does not describe a device in communication with a client or proxy client as is required by each independent claim. Nor does Arteaga suggest that the actions of the operating system on the client influence when the event notification is sent to the server. Arteaga therefore fails to teach or even suggest redirecting the event notification to the server before an operating system on the client can handle the event.

Soin, like Arteaga, fails to teach or suggest redirecting the event notification to the server before an operating system on the client can handle the event, as is required by each independent claim. Soin describes universal plug-and-play, a method for “issuing a Universal Plug and Play search” and listening for a device to advertise itself. *See* Soin, paragraph 113. Soin does not teach or even suggest redirecting an event notification much less redirecting the event notification to the server before an operating system on the client can handle the event. Thus,

Soin fails to teach or suggest each and every element of Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68.

Since neither reference teaches or suggests each and every limitation of claim 1, any combination of Arteaga and Soin similarly fails to teach or suggest those elements. Applicants respectfully submit that claims 1 and 11, are patentable over Arteaga in view of Soin and respectfully submit that the rejection of those claims is overcome and should be withdrawn.

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 were rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and in further view of U.S. Patent Number 7,171,478 to Lueckhoff (“Lueckhoff”). Applicants hereby cancel claims 35, 37, 46, 47 and 49, mooted this rejection with respect to those claims. Applicants respectfully traverse this rejection to the extent it is maintained over the claims as amended.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. Applicants’ arguments regarding Arteaga and Soin apply with equal force here and are reiterated as if set forth in full. Claims 2, 4, 13-14, and 16 depend from and incorporate all the patentable subject matter of Claims 1 and 11. The Examiner cites Lueckhoff merely for the purpose of addressing generating a context identifier and binding the context identifier to the event notification. As with Arteaga and Soin, Lueckhoff also fails to teach or suggest an event notification regarding a device in communication with the client or proxy client, and redirecting the event notification to the server before an operating system on the client can handle the event. Thus, Applicants respectfully request the Examiner withdraw the rejection of Claims 2, 4, 13-14 and 16.

Claims 5, 7, 17, 19, 38, 40, 50 and 52

Claims 5, 7, 17, 19, 38, 40, 50 and 52 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and in further view of U.S. Patent Number 6,982,656 to Coppinger (“Coppinger”). Applicants hereby cancel claims 38, 40, 50, and 52, mooted this rejection with respect to those claims. Applicants respectfully traverse this rejection to the extent it is maintained over the claims, as amended.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations

must be taught or suggested by the prior art. Applicants' arguments made above with respect to Arteaga and Soin apply with equal force here and are reiterated as if set forth in full. Claims 5, 7, 17 and 19 depend from and incorporate all the patentable subject matter of Claims 1 and 11. The Examiner cites Coppinger merely for the purpose of generating an event notification as a result of a device arrival. As with Arteaga and Soin, Coppinger also fails to teach or suggest redirecting an event notification to the server before an operating system on the client can handle the event. Applicants respectfully request the Examiner withdraw the rejection of Claims 5, 7, 17, and 19 under 35 U.S.C. §103.

Claims 6, 8, 9, 18, 20, 39, 41, 42, 51 and 53

Claims 6, 8, 18, 20, 39, 41, 51 and 53 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin, in view of Coppinger, and further in view of U.S. Publication Number 2002/0114004 to Ferlitsch ("Ferlitsch"). Claims 9 and 42 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and in further view of Ferlitsch. Applicants respectfully traverse this rejection to the extent it is maintained over the claims, as amended. Applicants hereby cancel claims 39, 41, 42, 51 and 53, mooted this rejection with respect to those claims.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. Applicants' arguments made above with respect to Arteaga, Soin and Coppinger apply with equal force here and are reiterated as if set forth in full. Claims 6, 8, 9, 18 and 20 depend from and incorporate all the patentable subject matter of Claims 1 and 11. The Examiner cites Ferlitsch merely for the purpose of addressing sending an open command to a device. As with Arteaga and Soin, Ferlitsch also fails to teach or suggest an event notification regarding a device in communication with the client or proxy client, and redirecting the event notification to the server before an operating system on the client can handle the event. Applicants respectfully request the Examiner withdraw the rejection of Claims 6, 8, 9, 18, and 20 under 35 U.S.C. §103.

Claims 24-33, 57-76

Claims 24, 26, 57, 59, 67-68 and 75 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and further in view of U.S. Publication Number 2002/0159419 to

Morris (“Morris”). Claims 69 and 71 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin, in view of Morris and further in view of Coppinger. Claims 70 and 72 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin, in view of Morris, in view of Ferlitsch and in further view of Coppinger. Claim 73 is rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin, in view of Morris, and further in view of Ferlitsch. Claims 25, 27-31, 58, 60-64, 74 and 76 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin, in view of Morris, and further in view of Lueckhoff. Claims 32-33 and 65-66 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin, in view of Morris, in further in view of Lueckhoff. Applicants hereby cancel 24-27, 29-33, 51-67 and 69-76, mooted the rejection with respect to those claims. Applicants traverse this rejection to the extent it is maintained over the claims, as amended.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. Applicants’ arguments made above with respect to Arteaga, Soin, Lueckhoff, Ferlitsch, and Coppinger apply with equal force here and are reiterated as if set forth in full. Claims 28 and 68 depend from and incorporate all the patentable subject matter of Claims 1 and 11. The Examiner cites Morris merely for the purpose of emulating a plug-and-play event. As with Arteaga, Soin, Coppinger, Ferlitsch and Lueckhoff, Morris also fails to teach or suggest an event notification regarding a device in communication with the client or proxy client, and redirecting the event notification to the server before an operating system on the client can handle the event. Applicants submit that Claims 28 and 68 are patentable and in condition for allowance. Applicants respectfully request the Examiner to withdraw the rejection of Claims 24 and 68 under 35 U.S.C. §103.

New Claim 77

New claim 77 includes the limitation of means for redirecting said event notification to the server from the client, before an operating system on the client can handle the plug-and-play event. Accordingly, Applicants respectfully submit that claim 77 defines patentably over the prior art of record for the reasons given above.

VI. Conclusion

Applicants contend that each of the Examiner's rejections have been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted,

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